



PROGRESS REPORT NO. 180

TO: Robert Tan, U.S. Environmental Protection Agency (EPA) – via Electronic mail
Bonnie Arthur, EPA – via Electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via Electronic mail
Rob Orr, TAI – via Electronic mail

DATE: July 9, 2021

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) – Progress Report No. 180 Month Ending June 2021

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES):

TAI submitted the draft Phase II Data Summary Report (DSR) on May 17, 2021. TAI will submit a separate statistical analysis technical memorandum in July that will provide an evaluation of the study results. TAI has scheduled a call on August 9 to review and discuss the Phase II data and results with EPA and the SATES Technical Team.

The first Phase IV soil sampling event was conducted from May 17 through May 21, 2021. TAI coordinated with CCT to schedule the spring vegetation survey in advance of the soil sampling event. However, CCT was unable to perform the survey in May due to an unexpected change in staff availability, so the first post-application vegetation survey was conducted in June 2021. TAI will continue to coordinate with CCT for this work through the Phase IV monitoring segment of the project. The second soil sampling event is schedule for July 20 – 24, 2021.

Baseline Ecological Risk Assessment (BERA) – TAI submitted the pre-draft terrestrial BERA (the Interim Partial Upland BERA to EPA on June 24, 2021. This pre-draft BERA

will be revised based on EPA input and incorporated into the draft Site-wide BERA at a later date.

Remedial Investigation (RI) Report – TAI continued working on the pre-draft RI Report focused on the UCR upland areas (the Interim Partial Upland RI), for submittal to EPA in late July 2021. This pre-draft RI will be revised based on EPA input and incorporated into the draft Site-wide RI at a later date.

2019 Phase 3 Sediment Study:

2019 Phase 3 Sediment Study DSR – TAI submitted the draft DSR to EPA for review and comment on December 23, 2020. TAI received comments from EPA on the draft DSR on March 2, 2021. TAI submitted responses to EPA's March 2, 2021 comments and a draft final 2019 Phase 3 Sediment Study DSR to EPA for review and approval on April 1, 2021. As of this writing, TAI received comments on the draft final Phase 3 Sediment Study DSR on June 4, 2021 and provided response to EPA's comments and the Revised Draft Final Phase 3 Sediment Study DSR to EPA on July 6, 2021.

Bioassay Testing – In addition to data previously provided by EPA, via the U.S. Geological Survey Columbia Environmental Research Center (CERC), for the Phase 3 bioassay split sample program, CERC provided total recoverable metals data to EPA and TAI on January 8, 2021 and provided total organic carbon data from the bioassay split samples on February 2, 2021. TAI received from EPA on March 31, 2021 a Data Validation Report for chemistry work CERC completed on the bioassay split samples provided to EPA. TAI provided comments to EPA on the Data Validation Report on April 23, 2021. A call was held between EPA and TAI on April 30, 2021 to review and discuss EPA's analysis of the Phase 3 bioassay quartz sand control results, and an additional call with EPA's team was held on June 16, 2021 to further discuss the quartz sand control results. TAI received from EPA the Interlaboratory Split Sample Bioassay Comparison Memo on June 21, 2021. TAI is reviewing the split sample bioassay comparison memo and will provide comments to EPA in late July. As of this writing, TAI received the CERC Split Sample Bioassay Results Report on July 6, 2021.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.